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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast	)	
Service	)	

To: The Commission

REPLY TO COMMENTS ON FURTHER PETITION FOR RECONSIDERATION

Maranatha Broadcasting Company, Inc. ("MBC"), through counsel, hereby submits this brief Reply to Comments by Mountain Broadcasting Corporation ("Mountain") on MBC's Further Petition for Reconsideration of the FCC's *Memorandum Opinion and Order* in MM Docket No. 87-268, FCC 98-024, released February 23, 1998 (the "*MO&O*"). In its Further Petition, MBC suggested the possible assignment of Channel 8 as a paired DTV channel for WWAC-TV, Atlantic City, New Jersey, to eliminate the egregious short-spacing between the Channel 46 DTV allotments for MBC's WFMZ-TV, at Allentown, Pennsylvania, and WWAC-TV. Mountain, in its Comments, asserted that DTV operation on Channel 8 at Atlantic City, as suggested by MBC, would result in additional interference to the NTSC signal of WGAL-TV, Lancaster, Pennsylvania, and to Mountain's DTV operation at Newton, New Jersey, although Mountain acknowledged in its engineering statement that the increase in interference to its DTV operation would be *de minimus*.

This Reply is filed out of time; however, good cause exists to permit its filing. Mountain's Comments, although dated May 22, 1998, were received by MBC's counsel on June 6, 1998, unpostmarked. MBC makes no claim that Mountain's Comments were not filed and served as

represented in the Certificate of Service attached to the Comments. MBC only notes that, apparently, the Postal Service mishandled the mail and delivery. Additional delay in preparing this response was engendered when MBC's technical consultant, Robert W. Fisher, in reviewing Mountain's Comments, encountered what he describes as "a program error in the FCC's FLR program which caused as undercounting of the population in high density population group blocks." *See* Mr. Fisher's statement, "Review and Clarification of Exhibit 1," attached hereto. Over an extended period of time, Mr. Fisher worked to remove this "bug" from the program. The delay in filing this Reply, therefore, is attributable to reasons beyond MBC's control and should be excused.

The attached statement reflects Mr. Fisher's re-analysis of the proposed Channel 8 DTV allotment at Atlantic City, using a corrected version of the FCC's program. It shows (1) increase in interference to Mountain's DTV channel of 0.0012 percent, which Mr. Fisher describes as "below the threshold of accuracy for these methods;" (2) a decrease in interference of 0.176 percent to WBFF-TV, Channel 45, Baltimore, Maryland; and (3) an increase in interference to WGAL-TV, Lancaster, by 2.84 percent more than allowed in the Table of Allotments adopted in the *Sixth Report and Order*, 12 FCC Rcd 14588 (1997). Although WGAL-TV would receive additional interference, as Mr. Fisher points out in his statement, the total amount of interference is well within the range to which many stations have been subjected in order to achieve the FCC's goal of providing a paired DTV channel to each operating NTSC station.

Mr. Fisher's analysis shows that the proposed substitution of DTV Channel 8 for DTV Channel 46 is viable and comparable to other DTV allotments made in the *Sixth Report and Order*. Of at least equal importance, it shows the arbitrariness and capriciousness of the FCC's determination, in evaluating Petitions for Reconsideration of individual allotments in the *Sixth Report*

and Order, to impose the burden of proposing a specific substitute allotment, and where necessary securing the consent of potentially affected stations, on the petitioner. Virtually no engineering consultant in the private sector claims to be able to replicate the FCC's data. Mountain's consulting engineers claim only to have assessed the proposed Channel 8 assignment using "general FCC procedures outlined in OET Bulletin No. 69 and the FCC's DTV Proceeding" implemented in a program "*similar to* the FCC algorithm." (Emphasis supplied.) And, as Mr. Fisher shows, even the FCC's own program was flawed, leaving open to question the FCC's own results, as reflected in the *Sixth Report and Order*, and the FCC's comparisons of its data to the data offered by individual petitioners. Given the inevitable conflict between the FCC's data and the programs on which the private sector is dependent, the ability of petitioners to propose an allotment which satisfied the FCC's criteria was problematic.

For the foregoing reasons, including delay in service and the delay caused by the discovery of an error in the FCC's own computer program, the FCC should accept this Reply. In addition, the FCC should grant the relief sought in MBC's Further Petition for Reconsideration. It should either adopt one of the proposed substitute DTV allotments for WWAC-TV at Atlantic City or, utilizing its own program -- and the correct antenna pattern for WFMZ-TV, which has been inserted in the

FCC's data base since the release of the *MO&O* -- devise a new pair of DTV allotments for WFMZ-TV and WWAC-TV that eliminates the serious short-spacing between the two stations' DTV operations.

Respectfully submitted,

MARANATHA BROADCASTING COMPANY, INC.

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Its Attorney

July 30, 1998

Review and Clarification of *Exhibit 1: Technical Discussion in Support of Request for Modification of DTV Table of Allotments with Regard to DTV Channel 46, Atlantic City NJ.*

In reviewing the previous request for modification of the DTV table and the opposition filed by Mountain Broadcasting Corporation (Mountain), it is apparent that the following issues are relevant to the consideration of the proposal:

In their opposition, Mountain indicated a discrepancy in the overall population counts in the New York City area, and after careful review of the computer methodology, it was found that a program error had occurred in the FCC's FLR program which caused an undercounting of the population in high density population group blocks. The FCC's FLR program posted on the internet is the distribution specified in the Commission's OET-69 standard, and this version, as of the date of the proposed DTV table modification, contained some errors which would prevent the program from running without some modification. Third Coast had worked directly with the Office of Engineering and Technology to modify this program to run on Third Coast's Sun Microsystems UltraSparc computer, and it was felt that all "bugs" had been removed. However in the "patch" code written for the program, there was a variable used with an insufficient byte width which caused a truncation of the index data on certain high density population blocks, primarily in the New York City and Los Angeles areas. Smaller population blocks were correct and many were used in the verification process prior to running the program. However, in this DTV allotment proposal, the population figures are shown to be different from the FCC table of allotments and accordingly, all data has been re-run for all stations, with all of the Maranatha analyzed stations as well as all of the stations analyzed by Mountain. This data was re-run on the proposed channel 8 with the existing antenna pattern, center of radiation, and 3.2 Kw ERP.

It is important to note that even though there is a match in the NTSC population figures between the analysis and the DTV table, there will not be an exact correlation between the results of the DTV analysis and the DTV figures, due to the further requirement of signal to noise ratio protection at the edges of the noise limited contour of the DTV signal. This analysis was not used by the FCC in the DTV table of allotments, but was an added requirement in the Sixth Report and Order and the Reconsideration of that order. The FCC's FLR computer code used in this analysis uses these required algorithms, in compliance with the rules, and the program used for this analysis was exactly that specified by OET-69, rather than a substitute.

According to the re-run analysis, Mountain's channel 8, WMBC-DT Newton NJ, shows approximately 12 ten thousandths of one percent of additional interference, which is understood to be below the threshold of accuracy for these methods and is proposed to be no real increase in interference. There is also a very slight fractional percentage reduction in the interference to WBFF-DT Baltimore and a 0.176% reduction in interference to WFMZ-DT Allentown by implementing the proposed channel change. All of these percentages are considered to be negligible and to have little, if any, practical effect on the associated stations.

Further analysis indicates that all other stations except WGAL Lancaster PA show no increase in interference by the use of the proposed channel 8. Therefore, the only TV station affected by the proposed channel 8 change is WGAL, Lancaster PA which is shown to have a 2.8% increase in interference during the transition period. As indicated in the initial technical exhibit, this additional interference would not be permitted under the new rules, but is requested in the petition for reconsideration.

The predicted interference caused by the proposed channel change should not be considered as if in a vacuum: the tables of allotments in the Sixth Report and Order and the MO&O on Reconsideration are both based on the NTSC and the DTV services accepting some interference. In the most recent table of allotments, WGAL Lancaster receives a baseline of 21.6% interference from NTSC and the Commission has proposed increasing this interference level by an additional 1.46%. This proposal indicates an increase of 4.3% above the baseline, or 2.84% above the Commission's proposed level. This is not a completely unreasonable level of interference to be received by DTV. In reference, another station in the Lancaster PA market, WLYH, channel 15 is proposed to receive 7.5% of additional interference, according to the table of allotments. Mountain's station, while not predicted to receive significant interference from this proposal, is scheduled to receive an additional 19% of interference to their NTSC signal from DTV sources. The proposed interference levels are considerably below the levels used elsewhere by the Commission. Therefore, this channel is presented as a viable alternative to the previously selected channel 46.

Robert W. Fisher
Communications Consultant
Third Coast Broadcasting, Inc.

EXHIBIT #2 RESULTS OF FLR PROGRAM ANALYSIS

BASELINE INTERFERENCE WITH CHANNEL 46

Analysis of: 45N MD BALTIMORE

	POPULATION	AREA (sq km)
within Noise Limited Contour	5986372	19573.7
not affected by terrain losses	5815995	18639.5
lost to NTSC IX	54537	422.8
lost to additional IX by ATV	229962	169.1
lost to all IX	284499	591.9

Analysis of: 46A MD BALTIMORE
HAAT 386.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	5986372	19573.7
not affected by terrain losses	5907954	19130.8
lost to NTSC IX	7896	48.3
lost to additional IX by ATV	128139	813.4
lost to ATV IX only	136035	861.7
lost to all IX	136035	861.7
percent match ATV/NTSC	99.5	98.9

Analysis of: 69N PA ALLENTOWN

	POPULATION	AREA (sq km)
within Noise Limited Contour	2338472	12510.4
not affected by terrain losses	1927412	9999.6
lost to NTSC IX	12180	112.0
lost to additional IX by ATV	182734	315.9
lost to all IX	194914	427.8

Analysis of: 46A PA ALLENTOWN
HAAT 313.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2338472	12510.4
not affected by terrain losses	2151947	11390.9
lost to NTSC IX	33329	231.9
lost to additional IX by ATV	26874	243.9
lost to ATV IX only	39770	387.8
lost to all IX	60203	475.8
percent match ATV/NTSC	99.7	99.6

Analysis of: 8N CT NEW HAVEN

	POPULATION	AREA (sq km)
within Noise Limited Contour	6703557	28276.3
not affected by terrain losses	6061742	25665.0
lost to NTSC IX	1372130	2539.3
lost to additional IX by ATV	163472	1055.7
lost to all IX	1535602	3595.0

Analysis of: 10A CT NEW HAVEN
HAAT 363.0 m, ATV ERP 8.6 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6703557	28276.3
not affected by terrain losses	6252776	26176.9
lost to NTSC IX	725286	3223.1
lost to additional IX by ATV	186523	327.9
lost to ATV IX only	203654	399.9
lost to all IX	911809	3551.0
percent match ATV/NTSC	93.2	89.9

Analysis of: 40N NY BINGHAMTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	620076	14856.6
not affected by terrain losses	445546	12245.2
lost to NTSC IX	4412	208.0
lost to additional IX by ATV	348	16.0
lost to all IX	4760	223.9

Analysis of: 8A NY BINGHAMTON
HAAT 375.0 m, ATV ERP 3.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	620076	14856.6
not affected by terrain losses	597927	14552.7
lost to NTSC IX	64336	399.9
lost to additional IX by ATV	763	96.0
lost to ATV IX only	1220	140.0
lost to all IX	65099	495.9
percent match ATV/NTSC	99.9	99.7

WITH PROPOSED CHANNEL 8

Analysis of: 45N MD BALTIMORE

	POPULATION	AREA (sq km)
within Noise Limited Contour	5986372	19573.7
not affected by terrain losses	5815995	18639.5
lost to NTSC IX	54537	422.8
lost to additional IX by ATV	229962	169.1
lost to all IX	284499	591.9

Analysis of: 46A MD BALTIMORE
HAAT 386.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	5986372	19573.7
not affected by terrain losses	5907954	19130.8
lost to NTSC IX	7896	48.3
lost to additional IX by ATV	127953	805.3
lost to ATV IX only	135849	853.7
lost to all IX	135849	853.7
percent match ATV/NTSC	99.5	98.9

Analysis of: 69N PA ALLENTOWN

	POPULATION	AREA (sq km)
within Noise Limited Contour	2338472	12510.4
not affected by terrain losses	1927412	9999.6
lost to NTSC IX	12180	112.0
lost to additional IX by ATV	182734	315.9
lost to all IX	194914	427.8

Analysis of: 46A PA ALLENTOWN
HAAT 313.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2338472	12510.4
not affected by terrain losses	2151947	11390.9
lost to NTSC IX	33329	231.9
lost to additional IX by ATV	23104	191.9
lost to ATV IX only	28669	279.9
lost to all IX	56433	423.8
percent match ATV/NTSC	99.8	99.6

Analysis of: 8N CT NEW HAVEN

	POPULATION	AREA (sq km)
within Noise Limited Contour	6703557	28276.3
not affected by terrain losses	6061742	25665.0
lost to NTSC IX	1372130	2539.3
lost to additional IX by ATV	163472	1055.7
lost to all IX	1535602	3595.0

Analysis of: 10A CT NEW HAVEN
HAAT 363.0 m, ATV ERP 8.6 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6703557	28276.3
not affected by terrain losses	6252776	26176.9
lost to NTSC IX	725286	3223.1
lost to additional IX by ATV	186523	327.9
lost to ATV IX only	203654	399.9
lost to all IX	911809	3551.0
percent match ATV/NTSC	93.2	89.9

Analysis of: 40N NY BINGHAMTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	620076	14856.6
not affected by terrain losses	445546	12245.2
lost to NTSC IX	4412	208.0
lost to additional IX by ATV	348	16.0
lost to all IX	4760	223.9

Analysis of: 8A NY BINGHAMTON
HAAT 375.0 m, ATV ERP 3.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	620076	14856.6
not affected by terrain losses	597927	14552.7
lost to NTSC IX	64336	399.9
lost to additional IX by ATV	763	96.0
lost to ATV IX only	1220	140.0
lost to all IX	65099	495.9
percent match ATV/NTSC	99.9	99.7

BASELINE INTERFERENCE WITH CHANNEL 46

Analysis of: 8N PA LANCASTER

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	3553155	23944.6
lost to NTSC IX	768348	2241.3
lost to additional IX by ATV	51285	366.8
lost to all IX	819633	2608.1

Analysis of: 58A PA LANCASTER
HAAT 415.0 m, ATV ERP 382.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	4224050	24948.4
lost to NTSC IX	367465	858.6
lost to additional IX by ATV	992215	2688.7
lost to ATV IX only	1190758	2962.8
lost to all IX	1359680	3547.4
percent match ATV/NTSC	95.4	94.0

Analysis of: 9N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6388221	23831.3
lost to NTSC IX	88932	948.1
lost to additional IX by ATV	0	0.0
lost to all IX	88932	948.1

Analysis of: 34A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6457299	24831.5
lost to NTSC IX	525	12.0
lost to additional IX by ATV	17101	196.0
lost to ATV IX only	17524	204.0
lost to all IX	17626	208.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 7N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6396262	23851.3
lost to NTSC IX	31916	636.1
lost to additional IX by ATV	0	0.0
lost to all IX	31916	636.1

Analysis of: 39A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6456127	24779.5
lost to NTSC IX	3485	120.0
lost to additional IX by ATV	448515	1328.2
lost to ATV IX only	450186	1372.2
lost to all IX	452000	1448.2
percent match ATV/NTSC	93.3	95.4

Analysis of: 9N NJ SECAUCUS

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	17869788	26138.6
lost to NTSC IX	1228841	3461.5
lost to additional IX by ATV	57356	555.0
lost to all IX	1286197	4016.4

Analysis of: 38A NJ SECAUCUS
HAAT 500.0 m, ATV ERP 136.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	18007738	27013.0
lost to NTSC IX	67913	586.9
lost to additional IX by ATV	24483	163.7
lost to ATV IX only	40260	295.4
lost to all IX	92396	750.6
percent match ATV/NTSC	99.9	99.5

WITH PROPOSED CHANNEL 8

Analysis of: 8N PA LANCASTER

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	3553155	23944.6
lost to NTSC IX	768348	2241.3
lost to additional IX by ATV	152072	782.0
lost to all IX	920420	3023.3

Analysis of: 58A PA LANCASTER
HAAT 415.0 m, ATV ERP 382.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	4224050	24948.4
lost to NTSC IX	367465	858.6
lost to additional IX by ATV	992215	2688.7
lost to ATV IX only	1190758	2962.8
lost to all IX	1359680	3547.4
percent match ATV/NTSC	95.4	94.0

Analysis of: 9N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6388221	23831.3
lost to NTSC IX	88932	948.1
lost to additional IX by ATV	0	0.0
lost to all IX	88932	948.1

Analysis of: 34A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6457299	24831.5
lost to NTSC IX	525	12.0
lost to additional IX by ATV	17101	196.0
lost to ATV IX only	17524	204.0
lost to all IX	17626	208.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 7N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6396262	23851.3
lost to NTSC IX	31916	636.1
lost to additional IX by ATV	0	0.0
lost to all IX	31916	636.1

Analysis of: 39A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6456127	24779.5
lost to NTSC IX	3485	120.0
lost to additional IX by ATV	448515	1328.2
lost to ATV IX only	450186	1372.2
lost to all IX	452000	1448.2
percent match ATV/NTSC	93.3	95.4

Analysis of: 9N NJ SECAUCUS

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	17869788	26138.6
lost to NTSC IX	1228841	3461.5
lost to additional IX by ATV	57356	555.0
lost to all IX	1286197	4016.4

Analysis of: 38A NJ SECAUCUS
HAAT 500.0 m, ATV ERP 136.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	18007738	27013.0
lost to NTSC IX	67913	586.9
lost to additional IX by ATV	24483	163.7
lost to ATV IX only	40260	295.4
lost to all IX	92396	750.6
percent match ATV/NTSC	99.9	99.5

Analysis of: 8N PA LANCASTER

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	3553155	23944.6
lost to NTSC IX	768348	2241.3
lost to additional IX by ATV	51285	366.8
lost to all IX	819633	2608.1

Analysis of: 58A PA LANCASTER
HAAT 415.0 m, ATV ERP 382.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	4224050	24948.4
lost to NTSC IX	367465	858.6
lost to additional IX by ATV	992215	2688.7
lost to ATV IX only	1190758	2962.8
lost to all IX	1359680	3547.4
percent match ATV/NTSC	95.4	94.0

Analysis of: 9N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6388221	23831.3
lost to NTSC IX	88932	948.1
lost to additional IX by ATV	0	0.0
lost to all IX	88932	948.1

Analysis of: 34A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6457299	24831.5
lost to NTSC IX	525	12.0
lost to additional IX by ATV	17101	196.0
lost to ATV IX only	17524	204.0
lost to all IX	17626	208.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 7N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6396262	23851.3
lost to NTSC IX	31916	636.1
lost to additional IX by ATV	0	0.0
lost to all IX	31916	636.1

Analysis of: 39A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6456127	24779.5
lost to NTSC IX	3485	120.0
lost to additional IX by ATV	448515	1328.2
lost to ATV IX only	450186	1372.2
lost to all IX	452000	1448.2
percent match ATV/NTSC	93.3	95.4

Analysis of: 9N NJ SECAUCUS

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	17869788	26138.6
lost to NTSC IX	1228841	3461.5
lost to additional IX by ATV	57356	555.0
lost to all IX	1286197	4016.4

Analysis of: 38A NJ SECAUCUS
HAAT 500.0 m, ATV ERP 136.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	18007738	27013.0
lost to NTSC IX	67913	586.9
lost to additional IX by ATV	24483	163.7
lost to ATV IX only	40260	295.4
lost to all IX	92396	750.6
percent match ATV/NTSC	99.9	99.5

WITH PROPOSED CHANNEL 8

Analysis of: 8N PA LANCASTER

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	3553155	23944.6
lost to NTSC IX	768348	2241.3
lost to additional IX by ATV	152072	782.0
lost to all IX	920420	3023.3

Analysis of: 58A PA LANCASTER
HAAT 415.0 m, ATV ERP 382.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4695380	28265.9
not affected by terrain losses	4224050	24948.4
lost to NTSC IX	367465	858.6
lost to additional IX by ATV	992215	2688.7
lost to ATV IX only	1190758	2962.8
lost to all IX	1359680	3547.4
percent match ATV/NTSC	95.4	94.0

Analysis of: 9N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6388221	23831.3
lost to NTSC IX	88932	948.1
lost to additional IX by ATV	0	0.0
lost to all IX	88932	948.1

Analysis of: 34A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6457299	24831.5
lost to NTSC IX	525	12.0
lost to additional IX by ATV	17101	196.0
lost to ATV IX only	17524	204.0
lost to all IX	17626	208.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 7N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6396262	23851.3
lost to NTSC IX	31916	636.1
lost to additional IX by ATV	0	0.0
lost to all IX	31916	636.1

Analysis of: 39A DC WASHINGTON
HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6456127	24779.5
lost to NTSC IX	3485	120.0
lost to additional IX by ATV	448515	1328.2
lost to ATV IX only	450186	1372.2
lost to all IX	452000	1448.2
percent match ATV/NTSC	93.3	95.4

Analysis of: 9N NJ SECAUCUS

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	17869788	26138.6
lost to NTSC IX	1228841	3461.5
lost to additional IX by ATV	57356	555.0
lost to all IX	1286197	4016.4

Analysis of: 38A NJ SECAUCUS
HAAT 500.0 m, ATV ERP 136.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18292449	28921.4
not affected by terrain losses	18007738	27013.0
lost to NTSC IX	67913	586.9
lost to additional IX by ATV	24483	163.7
lost to ATV IX only	40260	295.4
lost to all IX	92396	750.6
percent match ATV/NTSC	99.9	99.5

BASELINE INTERFERENCE WITH CHANNEL 46

Analysis of: 63N NJ NEWTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	9415790	13628.8
not affected by terrain losses	8403764	11168.4
lost to NTSC IX	16353	189.0
lost to additional IX by ATV	1780351	410.1
lost to all IX	1796704	599.0

Analysis of: 8A NJ NEWTON
HAAT 223.0 m, ATV ERP 3.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	9415790	13628.8
not affected by terrain losses	9219063	12897.1
lost to NTSC IX	3508357	1238.3
lost to additional IX by ATV	1539	124.6
lost to ATV IX only	17114	209.1
lost to all IX	3509896	1362.9
percent match ATV/NTSC	63.7	93.6

Analysis of: 7N NY NEW YORK

	POPULATION	AREA (sq km)
within Noise Limited Contour	18249159	28749.7
not affected by terrain losses	17853961	26142.6
lost to NTSC IX	665067	2251.7
lost to additional IX by ATV	43682	459.1
lost to all IX	708749	2710.9

Analysis of: 45A NY NEW YORK
HAAT 491.0 m, ATV ERP 164.3 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18249159	28749.7
not affected by terrain losses	17955727	26745.5
lost to NTSC IX	43638	395.3
lost to additional IX by ATV	68183	291.4
lost to ATV IX only	80461	407.2
lost to all IX	111821	686.7
percent match ATV/NTSC	99.9	99.5

Analysis of: 53N NJ ATLANTIC CITY

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 46A NJ ATLANTIC CITY
HAAT 85.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

416804 calls to Longley-Rice; path distance increment 1.00 km

WITH PROPOSED CHANNEL 8

Analysis of: 63N NJ NEWTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	9415790	13628.8
not affected by terrain losses	8403764	11168.4
lost to NTSC IX	16353	189.0
lost to additional IX by ATV	1780351	410.1
lost to all IX	1796704	599.0

Analysis of: 8A NJ NEWTON
HAAT 223.0 m, ATV ERP 3.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	9415790	13628.8
not affected by terrain losses	9219063	12897.1
lost to NTSC IX	3508357	1238.3
lost to additional IX by ATV	1649	128.6
lost to ATV IX only	38627	249.3
lost to all IX	3510006	1366.9
percent match ATV/NTSC	63.7	93.6

Analysis of: 7N NY NEW YORK

	POPULATION	AREA (sq km)
within Noise Limited Contour	18249159	28749.7
not affected by terrain losses	17853961	26142.6
lost to NTSC IX	665067	2251.7
lost to additional IX by ATV	43682	459.1
lost to all IX	708749	2710.9

Analysis of: 45A NY NEW YORK
HAAT 491.0 m, ATV ERP 164.3 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18249159	28749.7
not affected by terrain losses	17955727	26745.5
lost to NTSC IX	43638	395.3
lost to additional IX by ATV	68183	291.4
lost to ATV IX only	80461	407.2
lost to all IX	111821	686.7
percent match ATV/NTSC	99.9	99.5

Analysis of: 53N NJ ATLANTIC CITY

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 8A NJ ATLANTIC CITY
HAAT 85.0 m, ATV ERP 3.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

422722 calls to Longley-Rice; path distance increment 1.00 km

CERTIFICATE OF SERVICE

I hereby certify that, this 30th day of July 1998, I caused a copy of the foregoing Petition for Reconsideration to be served by First Class United States mail, postage prepaid, on:

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